

Exhibit 1-C

EXHIBIT 1-C

POST-PETITION FEES

1. General tasks related to the Chapter 11 Bankruptcy Case filed by debtor				
SJK			445.5	35.50
06/13 – 07/13: Attention to bankruptcy filing (0.4); emails to client regarding same (0.2); attention to request for notice (0.4); revise draft of request for notice (0.5); attention to filing of notices and issue related to rents (0.4); telephone call to unsecured creditor regarding claim (0.1); email to unsecured creditor regarding same (0.1); telephone call to debtor's counsel (0.1); draft email to clients regarding status (0.1); revise draft of and finalize notice regarding cash collateral (1.5); emails to client regarding filings in bankruptcy (0.1); telephone call from clients (0.1); review forms for purchase of claims (0.4); draft email to client regarding briefs (0.2); draft claims purchase agreement (0.5); telephone call to clients regarding issue related to loan (0.2); analyze issues related to restructuring note (1.20); telephone call to creditor regarding claims purchase (0.2); revise draft of claims purchase agreement (1.80); email with client regarding same (0.2); emails with client (0.1); emails regarding claim purchase (0.4); email to client regarding ERAS claim (0.4); email with client regarding various matters related to case (0.3); telephone call to client regarding various issues (0.2); analyze authorities regarding particular loan revisions in bankruptcy (0.8); telephone call to client (0.2); draft email regarding loan provision issue (0.2); telephone call to B. Healy (0.3); draft email to client summarizing call (0.4); further call from B. Healy regarding settling case (0.4); further telephone call to client regarding settlement (0.3); emails regarding				\$15,815.25

EXHIBIT 1-C

POST-PETITION FEES

						<p>negotiations (0.2); review additional opposition (0.3).</p> <p>08/13 – 09/13: Review Debtor's status conference statement (0.5); attend status conference by telephone (0.7); attention to email from debtor's counsel regarding ERAS (0.3); draft status email for client (0.4); telephone call from clients regarding potential deal points (0.3); email with clients regarding status (0.2); telephone call from debtors counsel (0.2); telephone call from U.S. Trustee's attorney regarding status of case (0.2); emails regarding meetings (0.2); emails regarding setting meeting (0.2); telephone calls from client regarding various issues (0.2); email to debtor counsel (0.2); review insurance certificate (0.3); email debtor's counsel regarding same (0.1); emails regarding insurance (0.1); attention to new debtor's filings (0.2); email to client regarding same (0.1); telephone call from B. Healy (0.1); attention to finalizing letter to judge (0.2); emails regarding insurance certificate (0.2); review and revise draft of declaration (1.0); review amended petition (0.2); email to client regarding same (0.2); email to B. Healy regarding meeting (0.1); meeting with clients (0.7); revise draft of term sheet (1.5); lengthy meeting with clients, borrower and counsel regarding settlement (2.7); attend court hearing (1.0); revise draft of term sheet and email clients (1.5); revise draft of term sheet and email to client (0.2); telephone call to client (0.1); telephone call to B. Healy (0.1); revise draft of term sheet based on client input (0.5); emails regarding outstanding items (0.1); telephone call from debtor's counsel (0.2); emails regarding B. Healy request (0.1); attention to default interest calculation (0.6); emails to B. Healy regarding same and ERAS invoice (0.3); emails regarding negotiation and Rule 2004 Examinations (0.3);</p>
--	--	--	--	--	--	---

POST-PETITION FEES

3

EXHIBIT 1-C

POST-PETITION FEES

MHC																							

EXHIBIT 1-C

POST-PETITION FEES

					regarding same (0.3).	
MSF			229.5	5.20	<p>06/13 – 08/13: Communications with Attorney Kottmeier regarding bankruptcy filing by 272 East Santa Clara Grocery, LLC (0.1); review docket for information for Request for Special Notice (0.1); draft and revise Request for Special Notice (0.3); attention to preparation of Notice of Non Consent to Use Cash Collateral with Attorney Kottmeier (0.2); review deed of trust and assignment of rents and draft and revise Notice of Non Consent to Use Cash Collateral (0.5); communications with Attorney Kottmeier regarding filing and service of Request for Special Notice and preparation of Notice of Non Consent to Use Cash Collateral (0.6); review and revise Notice of Non Consent to Use Cash Collateral (0.3); research procedure for capturing websites for later use at trial or hearing (0.3); research same and attend to capture and saving of Santa Clara County website (0.6); research Homeowners' Rights Bill Foreclosure issues relating to personal property (stocks) for Attorney Kottmeier (0.8); communications with PLM Foreclosure regarding issues related to same (0.2); research foreclosures issues (0.5); forms of Notices of Private Sale (0.5).</p> <p>10/13: Attention to Attorney Kottmeier e-mail regarding claim issue.</p>	\$1,193.40
PRD			81	1.0	<p>08/13: Download contents of Santa Clara government website pages for later use in proceedings, and save to server.</p>	\$81.00
					SUBTOTAL:	\$21,585.15

EXHIBIT 1-C

POST-PETITION FEES

2. Performed services related to various bankruptcy motions including seeking a determination that the stay did not apply to rents in this matter

SJK				445.5	13.80	<p>06/13 – 08/13: Attention to results of research regarding rents (0.3); review specific authorities regarding rents (0.8); attention to issue related to ownership of rents and authorities regarding same (0.4); draft client declaration in support of motion that no stay exists (1.0); revise draft of declaration and email regarding same (1.0); work on motion regarding rents (1.0); draft and add to notice of motion and motion regarding rents (1.0); attention to communications with court regarding setting hearing date (0.3); revise draft of and add to motion regarding rents (1.0); emails with client regarding motion (0.1); revise draft of memorandum (0.2); telephone call from client regarding motion (0.1); telephone call to client regarding motion and other issues (0.2); attention to issues regarding filing of motion (0.5); review opposition to motion regarding rents (0.3); review debtor's case authority regarding rents (0.3); revise draft of reply regarding motion regarding rents (0.4); attend hearing on motion regarding rents and on motion regarding use of cash collateral (2.7); meet with B. Healy after hearing (0.4); draft email to client regarding results of hearing (0.3).</p> <p>10/13: review court order regarding rents (0.4); email to client regarding same (0.2); emails with client and telephone call to client regarding rents (0.2); email to B. Healy regarding same (0.2); attention to B. Healy email regarding rents (0.4); draft emails to client (0.3); draft response to B. Healy regarding rents (0.3); emails with debtors counsel regarding rents and debtor's</p>	\$6,147.90
-----	--	--	--	-------	-------	---	------------

EXHIBIT 1-C

POST-PETITION FEES

						proposals (0.5); emails with client and with B. Healy regarding rent payments (0.3); emails with debtors counsel regarding proposals and checks (0.3); telephone call from Client regarding responses to debtor and amounts (0.2); emails with debtors counsel regarding proposals and checks (0.3); draft letter to B. Healy regarding rent payments (0.3); attention to borrower email regarding rents and debtor's proposals (0.2).	
JMR				405	24.80	<p>06/13 – 08/13: Legal research regarding effect of bankruptcy on notice to tenant to pay rent per assignment of rents (4.0); advice regarding same (0.5); continued legal research regarding assignment of rents (0.8); e-memo to Attorney Kottmeier regarding same (0.2); continued research regarding same (1.0); advices regarding same and strategy (0.2); revise Notice of claim of title to rents and profits (0.8); begin preparation of motion for confirmation that automatic stay does not apply to rent payments (0.5); legal research regarding procedures for motion (0.5); advice regarding same and strategy (0.2); review and revise client declaration regarding same (0.6); correspond with Attorney Kottmeier regarding same (0.2); prepare points & authorities regarding motion to confirm no automatic stay with respect to rent payments (4.0); correspond with Attorney Kottmeier regarding same and strategy (0.3); additional research regarding motion to confirm no stay applies to rent (0.8); advice regarding same (0.2); review and revise notice of motion, motion and memo of points & authorities (0.8); review opposition to motion regarding rents (0.5); conference with Attorney Kottmeier regarding same and strategy for reply (0.2); prepare reply brief regarding motion for rents (3.0); legal research and analysis regarding same (2.2); advice regarding same (0.3);</p>	\$10,044.00

EXHIBIT 1-C

POST-PETITION FEES

					continued preparation of reply (1.0); brief for motion regarding rents (1.0); finalize reply brief for motion regarding rents (0.1); conference with Attorney Kottmeier regarding same (0.1). 10/13: Review order on motion regarding rents (0.1); advice regarding same and strategy (0.1); attention to issues related to deposit of rents (0.1).				
MHC			315	0.30	07/13: Research for motion to confirm no stay is in place (0.2); advice regarding same (0.1).				\$94.50
SUBTOTAL:							38.90		\$16,286.40
3. Opposing the Debtor's inadequate applications to employ counsel resulting the Debtor providing required disclosures									
SJK			445.5	3.50	07/13: Review counsel applications (0.2); email to client regarding same (0.2); telephone call from clients regarding actions to be taken (0.3); draft objection to employment of Rossi form (1.5); revise draft of objection to Goodsell firm (0.7); attention to filing of objections to counsel applications (0.2); attention to denial of orders by court regarding counsel (0.4).				\$1,559.25
JMR			405	2.50	07/13: Research and prepare objection to application to appoint general counsel for debtor.				\$1,012.50
SUBTOTAL:							6.00		\$2,571.75

EXHIBIT 1-C

POST-PETITION FEES

4. Opposing the Debtor's initial cash collateral motion (which was denied)						
SJK			445.5	3.40	06/13 - 08/13: Revise draft of notice of Non Consent to Use of both Cash Collateral (0.9); and cross motion regarding use of cash (0.2); attention to points for response on cash collateral motion (0.4); review and revise draft of opposition to sue of cash collateral (1.0); revise draft of opposition to cash collateral motion (0.7); 10/13: Attention to B. Healy email regarding cash collateral (0.1); email to client regarding same (0.1). 10/13: Advise regarding response to proposal for stipulation for use of cash collateral.	\$1,514.70
JMR			405	0.10		\$40.50
MHC			315	7.70	08/13: Review correspondence regarding cash collateral opposition (0.7); advice regarding same (0.2); review briefs (0.3); case law research regarding cash collateral in single asset real estate cases (1.0); research regarding cash collateral use (1.0); draft opposition to debtor's motion to use cash collateral (2.2); review and revise opposition to motion to use cash collateral (2.3).	\$2,425.50
SUBTOTAL:				11.20		\$3,980.70
5. Moving for relief from the automatic stay based on the unconfirmable plan filed by the Debtor						
SJK			445.5	20.80	07/13: Review authorities regarding amending deed of trust (0.2); draft email to client regarding stay motion regarding stay and other bankruptcy issues (0.2); formulate arguments for relief from stay (0.5).	\$9,266.40

POST-PETITION FEES

10

EXHIBIT 1-C

POST-PETITION FEES

					client in support of motion for relief for stay (0.4); exhibits thereto (0.3); confer with Attorney Kottmeier regarding hearing date (0.2); rules for service of motion for relief from stay (0.2); research local rules regarding service (0.2); research judge's calendar for available hearing dates (0.3); further attention to preparation of motion for relief from stay (0.6); draft and revise notice of motion for relief from stay and notice of hearing (0.5); review and revise relief from stay cover sheet (0.5); prepare additional relief from stay documents for filing and service (0.4); finalize notice of motion for relief from stay and notice of hearing (0.8); assist in final preparation of remaining motion for relief from stay documents for filing and service (0.7); including finalizing relief from stay cover sheet (0.4).		
SUBTOTAL:						29.90	\$11,483.10
6. Responding to Debtor's sale motion and dealing with closing of sale							
SJK			445.5	10.40	10/13: Attention to motions for sale of property filed by debtor (0.6); email to client regarding same (0.8); review motions regarding sell of property (0.2); attention to sale motion (0.3); telephone call from client regarding same (0.1); telephone call from client regarding motions and plan issues (0.1); attention to order setting hearings on sale and assumption motions (0.3); attention to orders from court regarding sale hearing (0.1); email client regarding same (0.1); review motion for sale or property (0.2); draft email to B. Healy regarding request to move hearing (0.2); begin work on sale motion response (0.3); attention to	\$4,633.20	

EXHIBIT 1-C

POST-PETITION FEES

					order regarding hearing and U.S. Trustee's objection (0.4); attention to various motions filed by debtor and email to client regarding same (0.4); telephone call from attorney for U.S. Trustee (0.2); revise draft of and add to response memorandum on motion for sale (1.2); review 2004 transcript testimony regarding broker for response to motion to sell (0.2); finalize response to motion to sell (0.3); emails to counsel and client regarding filing (0.2); review proposed forms of order and comment to debtor counsel (0.2); prepare for hearing regarding motion to sell (0.7); attend hearing regarding sale (1.0); draft email to client regarding same (0.5); review papers and form of order and email to B. Healy and client regarding same (0.5); revise draft of from of sale order and email to debtor counsel (0.6); review final order and emails regarding same (0.2); telephone call from clients (0.2). Review and analyze debtor's ex parte application to have same motion heard on shortened time (0.7); conference with Attorney Kottmeier regarding strategy for response to same (0.3).	
JMR			405	5.70	10/13: Research and analyze debtor's motion to sell property free and clear of liens (0.5); review motion papers (0.3); advice regarding same and strategy (0.2); analyze strategy for response to motion to sell property (0.2); begin to prepare same (0.2); prepare response to motion to sell property (2.0); legal research and analysis regarding same (2.0); correspond with Attorney Kottmeier regarding same (0.3).	\$2,308.50
SUBTOTAL:					16.10	\$6,941.70

EXHIBIT 1-C

POST-PETITION FEES

7. Opposing Plan filed by the debtor						
SJK			445.5	14.70	09/13: Review debtor's proposed plan (0.2); email to clients regarding same (0.2); prepare for hearing on motions (0.6). 10/13: Revise draft of and finalize objection to disclosure statement (0.5); review plan and begin work on objections (1.3); work on plan and disclosure statement objections (1.3); research and objection to disclosure statement and plan (1.5); research and draft objection to disclosure statement (1.5); draft objections to disclosure statement (2.0); revise draft of objections (2.0).	\$6,548.85
SUBTOTAL:				14.70		\$6,548.85
8. Assisting BPB in its preparation of its Proof of Claim and responding to the Debtor's objections to same						
SJK			445.5	7.30	09/13-10/13: review and revise draft of proof of claim (1.4); revise draft of and add to proof of claim (1.5); email to client regarding proof of claim (0.2); revise draft of and add to declaration and proof of claim (1.5); revise client declaration and attachment to proof of claim (0.6); email to client regarding same (0.2); email to client regarding items related to proof of claim (0.1); telephone call with client regarding proof of claim and declaration (0.2); attention to objection to claim (0.2).	\$3,252.15
MSF			229.5	4.80	09/13 – 10/13: Research factual background for claim (0.2); review loan documentation (0.2); draft and revise Attachment A narrative for proof of claim (0.5); review Attachment A to proof of claim (0.3); review and revise proof of claim form and send	\$1,101.60

EXHIBIT 1-C

POST-PETITION FEES

					with all exhibits to Attorney Kottmeier to review and transmit to client for review (1.0); review and revise attachment to proof of claim (0.3); claim form exhibits thereto (0.2); review table with calculated amounts which will be added as an exhibit to proof of claim (0.3); revise claim form and review and revise the declaration and Attachment A to the proof of claim based on same (0.4); review and revise proof of claim form to reflect the new amounts due (0.3); final preparation of proof of claim form (0.3); Attachment A and compilation of exhibits thereto for review by Attorney Kottmeier and transmittal to client for review and signature (0.5); arrange for filing of Boston Private Bank's proof of claim (0.3).	
SUBTOTAL:					12.10	\$4,353.75
9. Moving for Rule 2004 examinations and opposing and responding to debtors Rule 2004 application						
SJK			445.5	28.90	07/13 – 08/13: Analyze subordination issue and Rule 2004 scope (0.2); draft email to client regarding same (0.2); draft and revise email to client on issues related to Rule 2004 (0.8); draft Rule 2004 examination applications (1.0); revise drafts of same (1.0); draft supporting declarations and order (1.0); revise draft of and add to Rule 2004 examination requests (1.9); email to client regarding application (0.2); attention to email from U.S. Trustee and draft response (0.2); revise draft of Rule 2004 application form (0.6); revise draft of supporting declaration (0.6); email to client regarding same and regarding trustee's sale issue (0.2); revise draft of declaration for 2004 examinations (0.6); revise	\$12,874.95

POST-PETITION FEES

15

EXHIBIT 1-C

POST-PETITION FEES

						(0.5); revise draft of Rule 2004 Order (0.2); emails regarding documents (0.1); revise draft of order (0.4); email to B. Healy regarding same (0.1); emails regarding documents for production (0.1); telephone calls to client regarding same (0.1); attention to Rule 2004 issue (0.2).	
JMR	405	12.30				<p>07/13 – 09/13: Review correspondence to client regarding issue analysis and strategy related to loan modification and 2004 examinations (0.1); correspond with Attorney Kottmeier regarding same (0.1); review debtor's 2004 Exam Application for document production by client (0.2); advice regarding opposition to Debtor's Application for 2004 Examination of client (0.3); review filings related to same (0.3); conferences with and instruct Attorney Correa regarding same (0.4); begin to prepare opposition papers (1.0); review correspondence regarding meet and confer on our 2004 Examination Applications (1.0); Continued preparation of opposition to debtor's Application for 2004 Exam of client (4.0); attention to advice and strategy regarding same (1.0); prepare Attorney Kottmeier declaration regarding same (1.0); telephone call to opposing counsel regarding 2004 Exam to client (0.2); prepare for same (0.2); correspond with client regarding document production (0.1); telephone call and correspond with opposing counsel regarding 2004 Exam to client for document production and subpoena to Andrew Lewis (0.2); instruct Attorney Correa regarding subpoena (0.1); review and finalize same (0.5); telephone conversation with client regarding documents and background (0.2); correspond with opposing counsel regarding 2004 Exam to client and service of subpoena on A. Lewis (0.2); correspond with client regarding service of 2004 Exam on A</p>	\$4,981.50

EXHIBIT 1-C

POST-PETITION FEES

MHC					315	19.20	<p>Lewis (0.2); telephone conversation with client regarding strategy and status related to 2004 Exam for client documents (0.2); telephone conversation and correspond with client regarding document search (0.4); telephone conversation with client regarding same and strategy (0.4).</p> <p>07/13 – 09/13: Correspondence with Attorney Kottmeier regarding case law analysis and results (0.3); review objection to 2004 examinations and state court reply brief (0.5); advice regarding reply to 2004 application (0.2); draft reply to opposition to Rule 2004 application, including case law research (4.3); review and revise reply (0.4); prepare to file and serve same (0.2); telephone and correspondence with B. Healy regarding status (0.2); review amended objection to 2004 examinations (0.2); instructions to staff regarding same (0.2); review correspondence regarding 2004 Examination hearing (0.5); review 2004 Application by debtor for Boston Private Bank (0.5); advice regarding opposition to 2004 Exam (0.3); legal research regarding scope of 2004 Examinations (2.0); draft legal argument regarding same (3.5); review and revise correspondence regarding meet and confer for 2004 hearing (0.3); review and revise objection to 2004 Application (2.0); additional legal research regarding same (1.7); review correspondence regarding 2004 Examination Order (0.1); correspondence with Client regarding document review (0.2); confer with Attorney Kottmeier regarding same (0.1); attention to documents from bank for document review (0.2); correspondence with Attorney Ross regarding scope (0.1); advice regarding document review, scope (0.1); research regarding subpoena for 2004 Exam (0.2); prepare to serve</p>	\$6,048.00
-----	--	--	--	--	-----	-------	---	------------

EXHIBIT 1-C

POST-PETITION FEES

						subpoena (0.4); review correspondence regarding subpoena (0.2); review and respond to correspondence from Attorney Ross regarding 2004 Examination, and notice of default (0.3).	
MSF				229.5	2.00	07/13 – 09/13: Communications with Attorney Kottmeier regarding preparation of applications for Rule 2004 examinations to various third parties (0.3); research format and procedures for same and set up template application for same (0.9); ongoing emails to Attorney Kottmeier regarding preparation of applications for Rule 2004 examinations to various third parties (0.2); further research format and procedures for same (0.2); draft form application for same (0.4).	\$459.00
SUBTOTAL:					62.40		\$24,363.45
10. Preparing for and conducting the initial session of the examination of the Debtor's managing member Andrew Lewis							
SJK				445.5	12.10	09/13 – 10/13: Attention to status of issues (0.2); attention to materials for deposition (0.2); prepare for deposition (0.6); prepare for deposition (0.8); telephone call from B. Healy (0.3); prepare for deposition (0.8); review authorities regarding right to default interest (0.3); attention to emails for use in deposition (0.3); prepare for deposition (0.8); attention to client's email files (0.3); prepare for deposition; take deposition of A. Lewis (2.7); review produced documents (1.0); further examination of A. Lewis (2.0); meeting with client, A. Lewis and B. Healy regarding settlement following Rule 2004 Exam (1.0).	\$5,390.55
JMR				405	1.80	09/13 – 10/13: Advice regarding strategy for execution (0.2); correspond with client regarding e-mail search and production	\$729.00

EXHIBIT 1-C

POST-PETITION FEES

							(0.2); correspond with client regarding e-mail searches (0.2); attention to issues regarding same (0.2); review and analyze documents and e-mails related to Lewis Examination (1.0).	
MSF				229.5	6.00		09/13 – 10/13: Communications with Attorney Kottmeier regarding preparation for A. Lewis' Rule 2004 Examination (0.2); prepare documents for same (1.0); communications with Attorneys Kottmeier and Ross regarding Andrew Lewis Rule 2004 Examination (0.4); review client files for documents (0.8); discuss with Attorney Ross and review same (0.2); attend portion of A. Lewis Rule 2004 Examination regarding electronic records production (1.0); review cd produced by A. Lewis and compile potential deposition exhibits from his files for Attorney Kottmeier and client review (0.9); document and deposition exhibit organization (1.0); attend to A. Lewis deposition materials (0.2); attend to deposition exhibits (0.3).	\$1,377.00
PRD				81	2.30		09/13 – 10/13: Download zip files of client documents, sort on electronic database (0.5); load files to electronic database (0.2); load A. Lewis deposition transcripts to electronic database (0.2); load A. Lewis deposition exhibits to electronic database (0.2); create exhibit binders and deposition transcript binders (0.9); load video file of A. Lewis to electronic database (0.3).	\$186.30
SUBTOTAL:								
					22.20			\$7,682.85
TOTALS:				Blended Rate			Hours Billed	Value
							268.50	\$105,797.70